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Exhibit Q

Page 1

VOL. I PAGES 1-124 EXHIBITS 1-20

FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL LONGSHOREMEN'S ASSOCIATION, AFL-CIO, ET. AL, DEFENDANTS.

* * * * * * * * * * * * *

DEPOSITION OF STEPHEN KEEFE, taken on behalf of the Defendants, pursuant to the applicable provisions of the Federal Rules of Civil Procedure, before Bernadette J. D'Alelio, Notary Public and Court Reporter within and for the Commonwealth of Massachusetts, at the Offices of Mullen & McGourty, 52 Temple Place, Boston, Massachusetts, on May 8, 2006, at 10:01 a.m., as follows:

64 0/

- 1				
		Page 30		Page 32
	1	is that right?	1	anything that may have been said at a hearing,
	2		.2	but outside a hearing process?
		A. No, I was not.		
	.3	MR. LATHROP: I will object to	3	Did you understand that when I was
	4	the form of the question. We will stipulate	4	asking you that question?
,	5	that your interpretation is not correct. That	5	A. Yes.
4	6	the "continues" didn't mean continues through	6	Q. So with that understanding, have you
	7	January of '06; it meant continuing past	7.	ever had any conversation with Mr. Sullivan
7			ó	
	8	February of '03.	8	about your suspension?
	9	You've elicited everything else in	9	A. No.
	.10	terms of when it ended.	10	Q. Have you ever had any conversation
	11	BY MR. MAHONEY:	.11 .	with Mr. Richard Flaherty about your
	12	Q. If the statement said Keefe continued	12	suspension?
	13	through 2003 to receive income from John	13	
-	14	T. Clark, that would be a correct statement?	14	
	15	A. 2003?	15	with Mr. Picard, Joseph Picard, about your
	16	Q. Yeah. Right here.	16	suspension?
	17	A. Yes. Not for the whole year.	17	A. No.
	18	Q. I understand. Were you laid off from	18	Q. That's a no?
	19	Clark in 2003?	19	A. No.
	20	A. No. I just stopped working for them.	20	Q. What about Mr. Langin, have you ever
1	1		21	had a conversation with him about your
	21	Q. Why did you do that?		
	22	A. So I could get into the union and get	22	suspension?
	23 ,	straight with them.	23	A. No.
	24	Q. Back into Gang was it 10?	24	Q. What about Brendon Lee, did you ever
		Page 31		Page 33
	~ ·		-	
٠.	1	A. 11.	1	have a conversation with him about your
	2			
	_	Q. We will talk in more detail about your	, 2	suspension in 2003?
	3	Q. We will talk in more detail about your suspension in a little while. You were	2	suspension in 2003? A. About any suspension, no.
1		suspension in a little while. You were	2 3 4	A. About any suspension, no.
	3 4	suspension in a little while. You were suspended in 2003, in the spring of 2003; is	4	A. About any suspension, no. Q. When is the last time you spoke with
	3 4 5	suspension in a little while. You were suspended in 2003, in the spring of 2003; is that right?	5	A. About any suspension, no. Q. When is the last time you spoke with Mr. Lee?
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